



**Environment  
Environnement**

**MUNICIPAL/INDUSTRIAL  
STRATEGY FOR  
ABATEMENT (MISA)**

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**MISA ADVISORY COMMITTEE**

**ANNUAL REPORT 1991 - 1992**

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**MUNICIPAL/INDUSTRIAL  
STRATEGY FOR  
ABATEMENT (MISA)**

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**MISA ADVISORY COMMITTEE**

**ANNUAL REPORT 1991 - 1992**

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## MISA ADVISORY COMMITTEE FIFTH ANNUAL REPORT

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### NOTICE

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This bound annual report and collected MISA Advisory Committee and related documents are the property of the Minister of the Environment. The report is provided to MISA participants in good faith as timely communication to aid in the consultative process leading to the promulgation of MISA regulations. In addition, this report is available to interested members of the public on request. Readers should note that this report is intended only to reflect discussions in the development of MISA Effluent Regulations. Decisions relating to those regulations must receive Cabinet approval and must undergo public review before they can be considered final and released for promulgation. Any comments or questions related to this report should be addressed initially to the MISA Advisory Committee, Suite 401, 40 St. Clair Avenue West, Toronto, Ontario M4V 1M2 (Telephone No. 416-314-9255).

\* Version française disponible

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Please note that the Annual Report is available in French.

Province of Ontario  
Ministry of the Environment  
**MISA**  
Municipal/Industrial Strategy for Abatement  
Stopping Water Pollution at its Source

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**Fifth Annual Report**  
**MISA ADVISORY COMMITTEE**

Covering the period from April 1, 1991 to March 31, 1992.

(Including a summary of operations from the inauguration of the Committee in November 1986)

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**Permanent Membership:**

**Chair appointed July 1990:**

Dr. Isobel Heathcote, Member appointed December 1987

**Vice-Chair appointed April 1989:**

Mr. Kai Millyard, Member appointed November 1986

**Members:**

Mr. Harvey Clare, appointed November 1986

Dr. Paul Hebert, appointed November 1986

Ms. Joanna Kidd, Member to March 1992

Dr. Don Mackay, appointed November 1986

Mr. Paul Muldoon, appointed April 1989

**Former Members appointed November 1986:**

Dr. Douglas Hallett, Member and Chairman to October 1987

Dr. Monica Campbell, Member to May 1988

Ms. Toby Vigod, Member and Vice-Chairman to January 1989

Mr. James MacLaren, Member and Chairman to June 1990

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**Staff Members:**

**Scientific and Technical Coordinator:**

Mr. Michael Seto, February 1991 to May 1992.

Mr. Steven Klose, November 1990 to January 1991.

Ms. Yasmin Tarmohamed, September 1989 to October 1990.

Mr. Doug Vallery, April 1987 to September 1989

# **MISA ADVISORY COMMITTEE**

## **FIFTH ANNUAL REPORT 1991-1992**

### **OUTLOOK**

The past year of **MISA Advisory Committee** operations has seen the completion of Phase 1 of the MISA Program. Effluent monitoring regulations and data collection for all industrial sectors were completed by the Fall of 1991.

The nine industrial sectors are proceeding on slightly different schedules.

The current schedule indicates the completion of a Draft Effluent Limits Regulation by late 1991 to early 1992. For most sectors, Draft Effluent Limits Regulations should be available for public review by 1992. It is anticipated that the regulations will incorporate aspects of pollution prevention as an important step towards MISA's ultimate goal of zero discharge of persistent toxic chemicals to Ontario waterways.

During 1990, members of the MISA Advisory Committee were involved in the deliberations of the Issues Resolution Committees (IRC). These Committees were set up by the Ministry to establish, with industry participation, a resolution to sixteen fundamental issues common to the development of all effluent limits regulations.

In June 1990, the MISA Issues Resolution Process Committee Report was released for public review. The MISA Advisory Committee, industry and various public interest groups commented on the Draft IRC Report. During the past year, the Committee provided advice to the Minister on the completion of the Issues Resolution Process, particularly the review of the Issues Resolution Process Final Report Summary, which was published in September, 1991.

The completion of the Issues Resolution Process resulted in the standardization of procedures and criteria for regulation development. The guidance contained in the Final Report Summary is intended to assist the Joint Technical Committees in applying these procedures and criteria to each sector in drafting the Effluent Limits Regulation requirements.

During the coming year, the Committee looks forward to the participation of its members as individual observers on the various joint technical committees charged with developing specific sector effluent limits regulations. In view of the anticipated level of activity, the Committee anticipates continuation of its bi-weekly meeting schedule.

The Committee believes that it continues to contribute to the development of the MISA Program in a positive fashion, both through review of draft regulations and supporting documents, and through identification of new and emerging issues with potential to affect MISA. The Committee looks forward to continuing its role as a group of independent scientific and policy experts reviewing and advising on proposed regulatory principles and procedures.

**ONTARIO MINISTRY OF THE ENVIRONMENT  
MISA ADVISORY COMMITTEE**

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**FIFTH ANNUAL REPORT 1991-1992**

Covering the fiscal year April 1, 1991 to March 31, 1992.

(Including a summary of operations of the Committee from November 1986)

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**CONTENT**

**OUTLOOK**

1. Introduction
2. Mandate of the MISA Advisory Committee
3. Committee Membership
4. Committee Operations
5. Advice to the Minister
6. Committee Meetings
7. Budgetary Performance

<b>APPENDIX A</b>	Committee Permanent Membership - Biographical Notes
<b>APPENDIX B</b>	Advice to the Minister - Summary and Documentation

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**MISA - MUNICIPAL INDUSTRIAL STRATEGY FOR ABATEMENT  
- STOPPING WATER POLLUTION AT ITS SOURCE -**

## 1. INTRODUCTION

The MISA Advisory Committee (MAC) was established by the Minister of the Environment in late 1986, primarily to provide independent expert advice on the content of draft regulations being developed under the MISA Program of the Ontario Ministry of the Environment. While members of the committee are considered independent and represent only their individual expertise and experience, the operation of the committee serves to represent and protect the public interest by providing a third party opinion on the direction of water quality regulation in the Province of Ontario.

## 2. MANDATE OF THE MISA ADVISORY COMMITTEE

By Order-in-Council 2766/86 (October 23, 1986) pursuant to Clause 3(i) of the Environmental Protection Act (EPA), R.S.O. 1980, c. 141, the **MISA ADVISORY COMMITTEE** was established to provide advice to the Minister of the Environment in accordance with the White Paper "Municipal-Industrial Strategy for Abatement" released in June 1986 and more particularly:

- (a) to review draft regulations relating to monitoring and effluent limits prepared by the sectoral technical committees;
- (b) to liaise and work with the technical committees;
- (c) to provide advice and recommendations to the Minister on the content of the regulations;
- (d) to provide advice with respect to such other related matters as the Minister may prescribe.

The Committee was created solely to provide advice to the Minister upon request of the Minister; the Minister is not obligated to accept the **Advisory Committee's** advice and recommendations, but will take the Committee's advice into account when finalizing regulations. Subject to the EPA, and any Order-in-Council, the Ministry agrees to respect the independence that the Committee requires in order to carry out its advisory function. In accordance with Ontario government policy concerning the sunset review of advisory agencies, the existence of the committee was reviewed in advance of its expiration date of October 22, 1989 and the term of all members of the Committee and its function renewed until October 22, 1992 by Order-in-Council 2746/89.



### 3. COMMITTEE MEMBERSHIP

The following members were appointed by Order-in-Council 2997/86, dated November 13, 1986, to the **MISA Advisory Committee**, pursuant to Clause 3(i) of the Environmental Protection Act, for a term ending on the 22nd day of October, 1989:

Dr. Douglas Hallett of Acton - as Chairman  
Ms. Toby Vigod of Toronto - as Vice-Chairperson  
Dr. Monica Campbell of Toronto  
Mr. Harvey Clare of Toronto  
Dr. Paul Hebert of Windsor  
Dr. Don Mackay of Toronto  
Mr. James MacLaren of Toronto, and  
Mr. Kai Millyard of Ottawa

For business reasons, Dr. Douglas J. Hallett resigned as chairman and member of the Committee effective October 23, 1987. By Order-in-Council 2448/87, dated November 5, 1987, Mr. James MacLaren was appointed chairman of the Committee to replace Dr. Hallett. As well, by Order-in-Council 2629/87, Dr. Isobel Heathcote of the University of Toronto was appointed as a new committee member to fill the vacant position.

Dr. Monica Campbell resigned from membership on the committee as of May 1988, and Ms. Toby Vigod resigned as Vice-Chairperson and member as of January 1989. In order to replace these vacancies, Ms. Joanna Kidd and Mr. Paul Muldoon were appointed as members, and Isobel Heathcote and Kai Millyard were appointed as co-vice chairpersons by Order-in-Council 1002/89, April 1989.

Mr. James MacLaren was appointed as the Chairman of the newly created Ontario Water Services Secretariat effective July 1, 1990, and thus resigned as Chairman of the Committee. Dr. Isobel Heathcote was appointed as Chair of the Committee effective July 15, 1990 by Order-in-Council 1849/90.

Ms. Joanna Kidd resigned from membership on the committee as of March 1992. As of March 1992, the Committee will therefore be operating with two vacant positions, one left by the departure of Mr. MacLaren, and one vacated by Ms. Kidd. The Committee is currently engaged in discussions with the Minister's Office regarding the appointment of new members to fill these vacancies.

All members of the **MISA Advisory Committee** are compensated according to Level 11 of Ontario Management Board Directives 6-1 (Sept. 1989) and are required to abide by Management Board Guidelines and Directives, including those related to conflict of interest.

A representative from each industrial sector, appointed by the Minister of the Environment through consultation with the sector, is to be a full member of **MAC** when regulations pertaining

to that sector are being reviewed. When matters pertaining to the municipal sectors are being reviewed, a representative of each of the Association of Municipalities of Ontario, and the Municipal Engineers Association, appointed by the Minister through appropriate consultation, will be members of the Committee. During this reporting period, those confirmed industrial representatives who have attended MAC meetings or who have been tentatively appointed to serve on the Committee are as follows:

- **Electric Power Generation represented by Ontario Hydro:**  
Mike Northfield
- **Iron & Steel Sector represented by the Canadian Steel Environmental Assoc. (CSEA):** Al Schuldt
- **Metal Casting Sector represented by the Metal Casting Environmental Committee (MCED):** Ian Hennessy
- **Mining Sector represented by the Ontario Mining Association (OMA):** Maxine Wiber, Brian Bell and Elizabeth Gardiner
- **Municipal Sectors represented by the Assoc. of Municipalities of Ontario (AMO) and the Municipal Engineers Association (MEA):** Milt Sather, CAO, City of Guelph (AMO)  
Bob Pickett, Director of Water Pollution Control, Metropolitan Toronto (MEA)
- **Organic and Inorganic Chemical Manufacturing Sectors represented by:** Don Kerr
- **Petroleum Refinery Sector represented by the Ontario Petroleum Assoc. (OPA):** Robert Fern
- **Pulp & Paper Sector represented by the Ontario Forest Industries Assoc. (OFIA):** Mickey Devine

As well, MISA Advisory Committee members are appointed as 'observers' to the Joint Technical Committees. The observers are responsible for keeping abreast of JTC business, and for acting as liaison between the JTCs and MAC. Due to the fact that generally MAC members have full-time careers elsewhere, their attendance at JTC meetings is optional, and they rely on the timely issuance of minutes and documentation to keep them up-to-date on JTC activity. The following is the current roster of MAC observers to the JTCs:

<b>Petroleum Sector:</b>	Harvey Clare
<b>Organic Chemical Manufacturing:</b>	Don Mackay
<b>Mining Sector:</b>	Harvey Clare
<b>Pulp &amp; Paper Sector:</b>	Isobel Heathcote
<b>Iron &amp; Steel Sector:</b>	Joanna Kidd
<b>Metal Casting Sector:</b>	Isobel Heathcote
<b>Inorganic Chemical Manufacturing Sector:</b>	Paul Hebert
<b>Municipal Sector:</b>	Kai Millyard
<b>Electrical Power Generation:</b>	Paul Muldoon
<b>Industrial Minerals Sector:</b>	Paul Muldoon

#### **4. COMMITTEE OPERATIONS**

The Committee is bound by its Memorandum of Understanding (MOU), signed in May 1988 as a form of agreement between the Minister, the Deputy Minister and the Committee. Based on the re-establishment of the Committee following sunset review, the Memorandum of Understanding was modified. In addition, the Committee has prepared more detailed Operating Procedures, which are modified from time to time. Until June, 1992, the Committee was housed in premises provided by the Ministry at 112 St. Clair Avenue West, Suite 502, Toronto, Ontario M4V 1N3 (Telephone No. 416-965-1400). In June 1992, the Committee's offices were relocated to 40 St. Clair Avenue West, Suite 401, Toronto, Ontario M4V 1M2 (Telephone No. 416-314-9255).

The Committee's regular meetings are scheduled for the second and fourth Fridays of each month, but it may convene at other times depending on the workload. In terms of workload planning, the Committee is dependent for the most part on the Ministry's adherence to the MISA Regulatory Development schedule and to the timely provision of background information and documentation.

During the past fiscal year, the MISA Program continued its activities in the Issues Resolution Process in support of the MISA Effluent Limits Regulations. This process is intended to provide fundamental guidance to the JTCs in the development of draft effluent limits regulations. As a result, JTC activity, and Committee deliberations relating to the development of regulations for individual sectors, were somewhat reduced during this period. There were seventeen regular Committee meetings during this reporting period.

#### **5. ADVICE TO THE MINISTER**

The MISA Advisory Committee's Advice to the Minister and Committee responses to referrals from the Minister constitute the Committee's primary contribution to the MISA Program.

During the course of the year, the Committee's primary focus was direct participation in the Issues Resolution Process as directed by the Minister. As discussed above, the Issues Resolution Committees had earlier developed responses to the sixteen issues to be resolved. These IRC reports were presented in a Summary Report, "MISA Issues Resolution Process", prepared by MISA program staff. This report contained a number of issues where consensus had not been achieved and the Minister's decision as to a satisfactory resolution was thus requested. At the request of the Minister, the Committee spent a significant amount of time discussing these more difficult issues and preparing advice to the Minister on their resolution. In the Summer of 1991, MISA staff prepared a draft summary report on the Issues Resolution Process, which was subsequently referred to the Committee for review and comment. The Issues Resolution Process Final Report Summary was published by the Ministry in September 1991.

In July, 1991, the Committee completed another major piece of work in releasing the full technical version of its report Water Conservation in Ontario, which identifies the links between water quality degradation and deteriorating infrastructures in the Province. The report emphasizes the need for water conservation and full-cost pricing of water and sewer services as a mechanism to protect and enhance Ontario's \$50 billion investment in municipal water and sewer systems. During this reporting period, MAC representatives also participated in the Ministry of Natural Resources' series of workshops to develop a Provincial Water Efficiency Strategy, from November 1991 to February 1992.

In addition, the MISA Advisory Committee and the Advisory Committee on Environmental Standards provided the Minister through the Director of the Hazardous Contaminants Branch with advice on the Candidate Substances List for Bans and Phase-outs, which MAC believes is a significant step towards zero discharge of persistent toxic contaminants.

Finally, the Committee has spent considerable time over the past fiscal year in discussions regarding issues in the municipal sector. This sector poses special problems in respect of the high cost of universal upgrading, the intransigence of toxicity problems, and the fact that municipal services are essential for the safeguarding of public health.

The Committee's Advice to the Minister is summarized and presented in Appendix B.

## **6. COMMITTEE MEETINGS**

As of March 31, 1992, the **MISA Advisory Committee** has held 89 meetings since its inception. Minutes are available to **MISA** participants and to the public on request. Minutes are routinely distributed to MOE Senior Management, MISA Managers and Sector representatives to **MAC**. Minutes for the period are bound and generally include background documents which are pertinent to Committee discussions.

In addition to a specific meeting Agenda, the **MISA Advisory Committee** periodically publishes an "Outstanding Issues List" which acts as an agenda of continuing items and which briefly describes the nature and status of issues which have been brought to **MAC's** attention and on which **MAC** intends to act. As of mid-1992, major continuing items or issues which have appeared on the "Outstanding Issues List" are:

1. The **MISA Municipal Program** remains a major priority of the Advisory Committee. During the past year, five municipalities have been involved in the Sewer Use Program demonstration projects which are in progress. These demonstration projects will lead to the derivation of local limits. The Advisory Committee is most interested in participating in a strong consultative process leading to an effective sewer use control program and the optimized operation of sewage treatment plants.

2. The **MISA Analytical Program** remains a primary interest of the MISA Advisory Committee. The Committee has reviewed several Interlaboratory Study Reports during the past year and continues to watch the results of the round-robin program closely. The purpose of the QA/QC program conducted by the Ministry is to ensure the collection of accurate and comparable data in the MISA Effluent Monitoring Program. The Committee has expressed concern regarding the QA/QC program and the Interlaboratory Studies, particularly with respect to their application in the setting of effluent limits for the Regulations.
3. The **Advisory Committee** supports the Minister's emphasis on pollution prevention and zero discharge of persistent toxic substances in the MISA program. The Committee is interested in the application of these concepts in the MISA effluent limits regulations. In particular, MAC believes that non-toxic effluents may be difficult to achieve for all facilities within three years, and is therefore interested in developing a strong and consistent approach to managing problems of persistent non-compliance.
4. **The Municipal Water Conservation Project** was commenced during 1990. The purpose of this study is to reveal the need and benefits to Ontario water resources of the control of pollution emanating from urban communities, as well as the protection of their drinking waters, and the preservation of the physical integrity of their water and sewage works. The costs of the needed conservation programs and their impacts on current user fees is an important finding of this study. The Committee has produced a Summary Report and a more detailed Technical Report, both of which have been submitted to the Minister for her review.
5. Follow-up items as a result of discussion on **MISA Regulations and Issues** include:
  - status for the Listing/Delisting Process for schedules included in regulations;
  - status of Analytical Methodology Development for selected **EMPPL** compounds;
  - status of research and development on sampling and analysis and flow measurement protocols;
  - eventual determination of the practical interpretation of "Virtual Elimination" as employed in the **Great Lakes Water Quality Agreement**.
  - ultimate enforcement practices and the consequences of non-compliance.

7. **BUDGETARY PERFORMANCE**

The MISA Advisory Committee has operated within its budget during fiscal years 1987-1988, 1988-89, 1989-1990, 1990-91 and 1991-92. Detailed budgetary information is available at the MISA Advisory Committee Office.

**APPENDICES:**

- A. Committee Permanent Membership - Biographical Notes
- B. Advice to the Minister - Summary and Documentation



## **APPENDIX A**

### **M I S A ADVISORY COMMITTEE PERMANENT MEMBERSHIP**

#### **Chair - Dr. Isobel HEATHCOTE**

**Dr. Heathcote** was appointed as an Associate Professor with the University of Guelph in July 1991, where she is cross-appointed between the School of Engineering and the Faculty of Environmental Science. She was formerly Director of the Environmental Studies Program at the University of Toronto and Dean of Women and Director of Residences at University College of the University of Toronto. She has been responsible for coordinating a large interdisciplinary staff in the identification of environmental impacts of water pollution in the Great Lakes and has considerable experience in water quality issues in general, private sector abatement efforts and the public regulatory framework. She is most familiar with the pulp and paper and mining industries and the effects of their effluents, as well as modelling of contaminant transport in aquatic systems.

#### **Vice-Chair - Kai MILLYARD**

**Mr. Millyard** is the National Policy Director for Friends of the Earth and a private consultant. Over the last 6 years as a researcher and advocate for Pollution Probe, he has directed educational programs and influenced public policy on environmental issues ranging from waste management and energy conservation to water pollution control. Through membership in municipal, provincial, national and international boards and government committees, he is familiar with a wide variety of pollution control and regulatory programs.

#### **Member - Harvey CLARE**

**Mr. Clare** is a retired executive with Imperial Oil Limited. From 1969 to 1982, he was the Environmental Protection Coordinator for Imperial Oil; prior to that he held, among other positions, Manager for Planning and Investment Logistics, and Manager for the Refining Coordination Division. Mr. Clare is a past president and founder of the Petroleum Association for Conservation of the Canadian Environment (PACE). He is also a former treasurer of the Conservation Council of Ontario.

**Member - Joanna KIDD**

**Ms. Kidd** is an environmental consultant specializing in public involvement techniques, communications and environmental policy research. She was formerly co-chair of the Toronto Waterfront Remedial Action Plan Committee, and is involved in the coordination of public involvement and planning processes for several waste management projects in Ontario. Ms. Kidd is a former staff researcher for the Pollution Probe Foundation, and from 1976 to 1981, was a research coordinator in the field of cancer epidemiology at the Faculty of Medicine, University of Toronto.

**Member - Paul HEBERT**

**Dr. Hebert** is a Professor of Biology and Chair of the Department of Zoology at the University of Guelph. His research examines a broad range of problems in aquatic biology ranging from work on the ecological impacts of introduced species to studies examining the mutagenic impacts of contaminant exposure on freshwater fish. As a past Director of the Great Lakes Institute, Dr. Hebert has participated in a broad range of projects examining technical and policy issues relating to the Great Lakes environment.

**Member - Donald MACKAY**

**Dr. Mackay** is a Professor at the University of Toronto, cross-appointed to the Departments of Chemical Engineering and the Institute for Environmental Studies. His research encompasses a range of environment areas, namely the impact of oil spills, the dynamics of organic contaminants - particularly in the Great Lakes ecosystem, and partitioning and solubility studies. His modelling of environmental systems is of particular note with respect to aquatic-based pollution control methods.

**Member - Paul MULDOON**

**Mr. Muldoon** is Counsel with Pollution Probe and the Canadian Institute for Environmental Law and Policy. He specializes in environmental and international law. He has lectured on environmental law at McGill University and currently teaches a course in that subject at the University of Toronto. He has written extensively on issues such as an environmental Bill of Rights, toxic water pollution in Canada and ecosystem management through law reform. Mr. Muldoon is co-author of "Zero Discharge: A Strategy for the Regulation of Toxic Substances in the Great Lakes Ecosystem" and "A Prescription for Healthy Great Lakes".



## **APPENDIX B**

### **ADVICE TO THE MINISTER Summary and Documentation**

The MISA Advisory Committee's Advice to the Minister is summarized and presented under the following headings:

#### **B.1 MISA ISSUES RESOLUTION PROCESS**

- Letter to the Honourable R. Grier Re: MAC's Comments on the Issues Resolution Process Final Report Summary, September 9, 1991.

#### **B.2 MISA MUNICIPAL SECTOR**

- Letter to the Honourable Ruth Grier Re: MAC's Concerns Regarding Progress and Process in the MISA Municipal Sector, June 3, 1991.

#### **B.3 MISA ADVISORY COMMITTEE AND ADVISORY COMMITTEE ON ENVIRONMENTAL STANDARDS**

- Letter to the Honourable Ruth Grier, MAC and ACES - Re: Support Regarding Inclusion of Zero Discharge as a Principle in the MISA Program, November 12, 1991.
- Letter to Ivy Wile, Director of the Hazardous Contaminants and Standards Branch - Re: Review of Draft Candidate Substances List for Bans and Phase-outs, January 31, 1992.

#### **B.4 MUNICIPAL WATER CONSERVATION**

- Letter and Document to the Honourable Ruth Grier, Re: MAC's Technical Report on "Water Conservation in Ontario: Implementing the User Pay System to Finance a Cleaner Environment", July 29, 1991.

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## **APPENDIX B.1**

### **MISA ADVISORY COMMITTEE**

### **CORRESPONDENCE REGARDING THE**

### **MISA ISSUES RESOLUTION PROCESS**

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- Letter to the Honourable R. Grier Re: MAC's Comments on the Issues Resolution Process Final Report Summary, September 9, 1991.



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September 9, 1991

The Honourable Ruth Grier  
Minister of the Environment  
15th Floor  
135 St. Clair Ave. West  
Toronto, Ontario  
M4V 1P5  
Att'n: Ms. Joyce McLean

### ISSUES RESOLUTION PROCESS FINAL REPORT SUMMARY

Dear Mrs. Grier:

Further to your request, the members of the MISA Advisory Committee have had an opportunity to review the document entitled Issues Resolution Process Final Report Summary (August 1991) and have the following comments to offer.

As you know, we believe that this document will be fundamental in providing advice to the JTCs in their deliberations, and offers an important opportunity for you to articulate your administration's approach to key issues.

MAC was pleased to see that the length of the summary document is greatly reduced and thus is more readable than in the earlier version. We were also pleased to see that a number of changes had been incorporated addressing concerns raised earlier by MAC and others. The format offers a good overview of the process, the public response, and the Ministry's resolution of the issues.

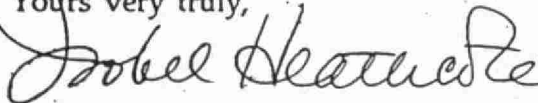
The following are our major concerns regarding the document; more detailed comments are provided in the attached pages.

- While much improved over earlier drafts, the document still fails to provide guidance on broad issues raised in the public review. Of particular concern is the lack of clear direction on the status and future of the municipal sector and on relationships with other programs such as the Remedial Action Plans.
- Zero discharge and reduction of persistent toxic are mentioned, but are not tied to any future stages or times. MAC strongly advocates articulation of clear goals and timetables for the MISA program, and particularly for these important initiatives. Without such a context, proposals such as these may seem to be only political "window dressing", without real substance.
- MAC remains puzzled as to why BAT selection has been restricted to North America, Europe and Southeast Asia. There is no question that valuable technologies exist elsewhere in the world. Restricting the search without a clear rationale may limit our options and make the Ministry appear unnecessarily parochial in its views.

- MAC has always believed that the EA analysis proposed in the Issues Resolution Committee Reports was unnecessarily costly and time-consuming. There is a need to articulate whether impacts on the sector, firm, or plant will decide achievability, and a need to limit analysis to determination of relative cost-efficiency for the candidate technologies.
- There is no mention that industries may receive special consideration in cases where non-compliance is attributed to contaminated intake waters (Net Loadings), despite frequent discussions of this in Issues Resolution Committee meetings and in earlier documents.

In summary, MAC finds that the draft document is a considerable improvement over earlier drafts. Although a number of our concerns remain unaddressed, none of these are so extreme as to delay release of the document. We would be happy to discuss our comments with you at your convenience, or to answer any other questions you may have about this response.

Yours very truly,



Isobel W. Heathcote  
Chair  
MISA Advisory Committee

DETAILED COMMENTS  
ISSUES RESOLUTION PROCESS FINAL REPORT SUMMARY

PAGE	PARAGRAPH	COMMENTS
i	1	MAC and Environment Canada participated in the process as observers only; this should be made clear.
i	Footnote	Was the June 1990 Committee Reports document never finalized? MAC believed that it was, and thus that this present document should not appear to be a revised version of the 1990 report. If it was never finalized, this footnote is appropriate.
1	1	The White Paper of 1986 (page 7) explicitly states the goal of MISA as the virtual elimination of toxic chemicals; there is no reference to persistence, although later documents have incorporated this term.
1	3	It is inappropriate to introduce a discussion of the technology track without an accompanying discussion of the water quality track. The document should discuss overall progress, or progress on each front (i.e. technology and water quality tracks).
i	Last bullet	The phrase beginning "In addition, approximately 12,000..." should be in a larger font and should not be indented.
2	End of page	Neither this section nor the previous one contains any specific reference to the municipal sector. Since the status of this sector differs significantly from the industrial sectors, there is a need for a separate statement about it.
3	1	Delete commas after "concepts" and "process". Delete the sentence beginning "Thus, for each step in the regulation development process..."; its logic is circular and does not improve understanding of the process.
3	2	There is no mention of Periodic Review of the regulations as a separate issue, although it was established as one at the beginning of the Issues Resolution Process. MAC is concerned that this is not a trivial issues and should not be dropped from the list without discussion.
3	3	The wording is not clear in the sentence "The Ministry then identified an alternative..." Does this refer to the selection of a single preferred Ministry alternative, or to the Ministry's representation of the various positions put forward on the unresolved issues?

PAGE	PARAGRAPH	COMMENTS
4	1	Again, it should be made clear that MAC and Environment Canada participated as observers only.
5	1	Second sentence ("Included in the submissions were four from stakeholder groups that participated on the IRCs, namely, the MISA Advisory Committee, Environment Canada, Municipalities, and Industry.") is not clear. Did "Industry" for example submit a single response document? Please review the wording of this against the submission authors listed on page 6.
5	2	Remove quotation marks from the word "issues". It is an accepted term in this context and needs no special treatment. Note that the word "critique" should be plural, since several different criticisms ("critiques") about the program were received.
5	3	Suggest rewording of the first and second sentences to improve clarity: "Comments directly related to specific issues are not reproduced here, but are incorporated in Section IV, which presents the ..." The term "Chapter IV" should be replaced with the more standard "Section IV".
7	1	The term "multi-media" is insufficient in itself. Suggest instead "Multi-media Management" or "Multi-media Control" or a similar term
7	2	Suggest rewording of first sentence: Numerous concerns about the feasibility or effectiveness of the original MISA process for achieving virtual elimination..."
8	1	The first sentence refers to the need for integration of MISA with other initiative, for instance the RAP programs. This is a separate concern from that raised in the remainder of the paragraph (i.e. the need for multi-media environmental protection) and should be discussed separately from it. (And see comments above regarding the use of the term "multi-media").
9	4	Second sentence should read "procedures and criteria" and "enable examination". Third sentence should read "They also allow..."
9	5	Specify how other "unsatisfactory" QA/QC data can "still be useful for other program purposes and must be retained". If they are unsatisfactory, why are they useful? If they are satisfactory for some purposes, why not for others?

PAGE	PARAGRAPH	COMMENTS
9	5	MAC would like to see the results of interlaboratory "round robin" studies and other laboratory performance information potentially affecting the interpretation of results also reported in Development Document.
10	1	It is MAC's hope that all reporting of QA/QC analysis will be complete and fully explained in the Development Documents or in some other supporting documentation. Superficial reporting of this important activity may complicate data interpretation and mislead the reader.
10	3	MAC remains concerned about the treatment of outliers: how will they be determined, and by whom. The phrase "certain data which are identified as outliers will not be considered during limit setting but will remain in the data base" requires clarification and explanation. Note that apparent outliers may include surprisingly low but real values as well as high values. Those low values may be important in limit setting.
10	4	As with QA/QC, there is a need for comprehensive reporting of all data analysis activities, either in the Development Document or in some other more detailed supporting text.
10	6	As has been mentioned in several earlier comments, MAC strongly recommends abandoning the confidence limit approach in favour of a simpler rule whereby compounds found in more than 10% of samples would be candidates for limits. This approach is easy to understand and is independent of sample size effects.
10	6	The wording of this paragraph is difficult to follow and needs clarification. The first sentence seems to suggest that persistent toxics found frequently and at high concentrations will be excluded from consideration for limits. MAC strongly suggests rewording to improve clarity.
10	7	Whose Best Professional Judgement will be used to extend the list of selected parameters? On what basis might such a decision be made? Please clarify.

PAGE	PARAGRAPH	COMMENTS
11	Bullets	MAC is pleased to see the introduction of references to zero discharge and reduction of persistent toxics. However, the timing and staging of these important initiatives is not clear. How will substances be identified for these programs? Who will do it? Through what process? Why will effluent limits be set only for a "short list of sector specific parameters"? Can we be sure that this will be the case for all sectors? Finally, there is no need for caps in the phrase "No acute toxicity in effluents".
11	6	Replace last sentence with more specific references to zero discharge and reduction of persistent toxics. This sentence is too vague and gives the reader no idea of the nature of future stages or their timing.
12	1	Water conservation should not be a separate item in this list of BAT preferences; it is a possibility with any BAT technology.
12	2	There is no reference to conservation of energy and land, which MAC believes are important in BAT identification.
12	3	MAC strongly objects to the phrase limiting BAT selection to North America, Europe and Southeast Asia. Brazil, for example, apparently has outstanding biological engineering technologies in place. Why would we exclude other jurisdictions from the search? There is every reason to broaden the search, and little reason to restrict it. As we have noted in earlier comments, the document should simply indicate "anywhere in the world".
12	4	MAC believes that a statement should be prepared to the effect that implementation of BAT represents on the first phase of a longer term program.
12	6	MAC remains concerned that the procedures laid out in the Issues Committee Reports are unnecessarily complex and time-consuming. All that is needed is an assessment of the relative cost-effectiveness of the candidate technologies, and their probable impacts on the sector.
13	1	In previous comments, MAC has advised against the consideration of private benefits because they are difficult to quantify and highly controversial. Defining them may introduce unwarranted delays.



PAGE	PARAGRAPH	COMMENTS
13	3	This section does not make clear how the final decision will be made. Will impacts on sector, on firm, or on plant be the deciding factor? What happens if a BAT is achievable for the sector, but will result in the closing of one or more outdated facilities? Or is a BAT considered not achievable if <u>any</u> facility will be closed? This is an important question deserving a clearly articulated answer.
14	3	As has been mentioned in several earlier documents, MAC believes that concentration and production-based limits should <u>never</u> appear without corresponding loading limits. There is also no reference to the imposition of annual loads, either immediately or at some point in the future.
14	5	In several earlier documents, and indeed in numerous meetings with IRP committee members, the Ministry has taken the position that dischargers who can prove that they are out of compliance because of contaminated intake waters will not be considered in violation of the regulation. There is no reference to this issue, or indeed to compliance issues at all, in the present document.
15	5	References to sublethal and chronic toxicity monitoring should specify the use of testing on fathead minnows and <u>Ceriodaphnia</u> , the only organisms for which accepted protocols exist.
15	7	MAC is confused by the special treatment apparently accorded flow measurement non-compliance. While other non-compliance events may result in Ministry enforcement action, the Ministry appears to be asking only for immediate notification if a discharger is out of compliance on flow measurement accuracy requirements.
16	1	MAC remains convinced that the present C of A system is inadequate and would greatly prefer the introduction of a permit system; see our earlier comments on this issue in several other documents.
16	5	The nature of the self-monitoring control plan, to be imposed in lieu of interim limits, is not clear.
17	4	Whose Best Professional Judgement may be used to shorten EMPPL through exclusion of parameters not associated with process operations? What justification will be required for such exclusion?

PAGE	PARAGRAPH	COMMENTS
17	5	MAC would prefer to see quarterly monitoring for full EMPPL characterization, including any new EMPPL compounds.
17	5	It should be explicitly stated that the sampling day should represent a normal production day.
17	5	Assessment monitoring for chronic toxicity should appear here as well as in Toxicity for clarity (cross reference if necessary).
18	2	MAC is not in favour of option (3), delaying implementation of a Stormwater Control Study until the next regulation update, particularly since no specific date is mentioned for regulation review.
19	6	MAC has always held that the Ministry should use the same method of assigning values less than RMDL in reporting to the public as for compliance assessment.
20	End of Page	MAC remains concerned that the issue of Periodic Review of Limits has been dropped from the response document. This is not a trivial issue and deserves explicit mention.

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## **APPENDIX B.2**

### **MISA ADVISORY COMMITTEE**

### **CORRESPONDENCE REGARDING THE**

### **MISA MUNICIPAL SECTOR**

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- Letter to the Honourable Ruth Grier Re: MAC's Concerns Regarding Progress and Process in the MISA Municipal Sector, June 3, 1991.

June 3, 1991

The Honourable Ruth Grier  
Minister of the Environment  
15th Floor  
135 St. Clair Ave. West  
Toronto, Ontario M4V 1P5

Dear Mrs. Grier:

The MISA Advisory Committee recently reviewed a Position Paper from the Municipal Engineers Association (attached) regarding the future direction of the MISA Municipal Sector. MAC was pleased that the MEA had taken considerable pains to review the status of the sector and to arrive at concrete and constructive proposals for the future.

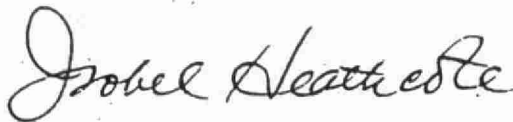
MAC would like to offer the following comments on their document.

1. MAC agrees with the MEA's assessment of the role of the JTC, but would be cautious about extending membership or even observer status to representatives from other Ministries. (We presume that the omission of MAC from the list of members/observers is unintentional!)
2. MAC agrees that the MEA should be actively included in JTC discussions. It has been an ongoing concern of ours that much of the work of the JTC takes place at the subcommittee level and is therefore closed to many JTC members and to all observers. Consultation at the JTC level, as elsewhere, must be full and meaningful.
3. MAC sees some merit in the suggestion that an objective party chair the meetings of the Municipal JTC. If an "outside" chair is chosen, it should be someone without ties to government or the municipalities, but with a working knowledge of both.
4. MAC agrees that the Sewer Use White Paper should be finalized; we have made this suggestion in earlier documents including our Advice to the Minister on Options for Expediting and Augmenting the MISA Process (January 14, 1991). The issue of financing for sewer use controls/enforcement is indeed an important one, as the MEA correctly points out.

5. MAC is distressed to hear that MEA is unaware of the results of the Demonstration Projects, although we ourselves were similarly in the dark until recently. MAC agrees that projects of this magnitude must be discussed in the JTC before initiation, and that all results and follow-up should be discussed by the full JTC.
6. MAC fully supports operator training and certification, as we have stated in several earlier documents. This is an inexpensive and highly effective way of maximizing sewage treatment plant performance. MAC has been frustrated by the many delays in this initiative over the past several years.

In summary, MAC perceives the MEA position paper as an important statement of concern and commitment. In a sector that has been marked more by inactivity than by progress, it is refreshing to see the MEA's willingness to work hard towards a satisfactory resolution of some very difficult issues. MAC recommends that you meet jointly with the MEA and AMO (who have somewhat different concerns) to discuss this document and establish a "game plan" for the future.

Yours very truly,



Isobel W. Heathcote  
Chair  
MISA Advisory Committee

The Municipality of  
Metropolitan Toronto

**Metropolitan Works Department**

Phoenix House, 9th Floor  
439 University Avenue  
Toronto, Ontario, Canada M5G 1Y8  
Telephone: (416) 392- 8232 Fax: (416) 392- 3817  
Address all correspondence to the Commissioner  
R.G. Ferguson, P.Eng., Commissioner of Works

1161 11 184V ✓



Refer to: R. M. Pickett

File no. 1078.80

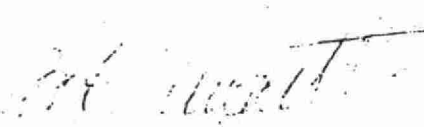
Date: April 3, 1991

Dr. Isobel Heathcote  
Vice Chairperson  
M.I.S.A. Advisory Committee  
Ministry of the Environment  
Suite 502, 112 St. Clair Avenue West  
Toronto, Ontario  
M4V 2Y3

Enclosed please find the position paper prepared by the Municipal Engineers Association (M.E.A.) on the future direction of the Municipal Joint Technical Committee for the M.I.S.A. program.

We apologize for the delay in sending this paper, as there was a mix-up in the communication process.

If you have any questions, please do not hesitate to call Lou Romano or myself.

  
R. M. Pickett, P.Eng.  
Acting Director  
Water Pollution Control

rmp:mm  
Encl.

c.c. Jeff Seton, President, M.E.A.  
Ruth Tovin, A.M.O.

MUNICIPAL ENGINEERS ASSOCIATION POSITION ON  
THE FUTURE COURSE OF THE MUNICIPAL JOINT TECHNICAL COMMITTEE.  
OF M.I.S.A.

1. The Municipal Joint Technical Committee (J.T.C.) should be where meaningful discussions and the sharing of ideas occurs between:
  - a. Ministry of the Environment - M.I.S.A. Office
  - b. Municipal Sector (made up of representatives from the Municipal Engineers Association and the Ministry of the Environment operating managers)
  - c. Environment Canada (E.C.) representatives
  - d. Municipal Affairs representatives
  - e. Department of Labour representatives
  - f. Association of Municipalities of Ontario (A.M.O.)

and any consultant or special representatives brought in from time to time.

The Municipal Engineers Association (M.E.A.) wishes to take part in the initial discussions, when topics are first evaluated, and not wait for a "final" presentation at J.T.C. meetings. The initial subcommittee should present its findings and recommendations to the J.T.C. for review, and modifications made if required.

2. J.T.C. Reports (unanimous or split) should be passed in a timely fashion to the Minister and to the Minister's Advisory Committee (M.A.C.). In this way the Minister and M.A.C. will be aware of the progress of the J.T.C. and whether there are unanimous recommendations or dissenting views. It is the wish of M.E.A. that our position be heard and recorded, not necessarily accepted.
3. The M.E.A. feels that perhaps more progress could be made if an independent member chair the meetings. It is difficult for the Ministry of the Environment chair to remain impartial due to a vested interest in upholding certain Ministry positions. This chair could be a person from the Department of Intergovernmental Affairs or Municipal Affairs, or a consultant chosen jointly by the M.O.E. and Municipal Affairs.
4. In order to obtain something tangible from the Municipal J.T.C., we suggest that the Sewer Use Regulation should be the pursued. This activity will keep us fully occupied, however, there has been a lot of work done.
5. We must discuss the results of the Demonstration Projects. There has been much confusion surrounding these projects which must be cleared up. In future, projects of this type should be discussed in the J.T.C. before initiation, as this will serve to speed up the progress of the study and eliminate any confusion.
6. The excellent training program initiated with regard to the Sewer Use Regulation must be fully developed and made more accessible throughout the Province.

M.O.E. staff have appreciated that the difficulties experienced in the U.S. were caused by untrained personnel.

7. The issue of how the Sewer Use Regulation is financed has not been addressed. We will have to devote considerable efforts to this topic. These discussions should include representation from A.M.O., Municipal Affairs and the Provincial Treasury Ministries.

Only this way can the issue of a universal and equitable financing method be established.

8. The Issue Resolution Process did not resolve the following issues:

- Economic Achievability;
- Toxicity and End of Pipe Quality;
- Storm Water;
- Statistical validation;
- Local Limits.

These issues we believe are peculiar to the Municipal Sector and not solvable through a generic approach.

9. As in the case of the Sewer Use Regulation, the cornerstone of the Treatment Plant Regulation should be operator training and operator certification. We must have trained and qualified staff to operate the treatment plants to meet the goals of M.I.S.A. minimum pollutants discharged to the natural waters.

In summary, the two organizations of M.E.A. and A.M.O., have reason to believe that they have not been full partners in this J.T.C. Without true meaningful discussions, an inadequate process will evolve and no foundation for partnership will exist. If we are not permitted to play a meaningful role, there is little point of continuing as members of this J.T.C.



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## **APPENDIX B.3**

### **MISA ADVISORY COMMITTEE AND ADVISORY COMMITTEE ON ENVIRONMENTAL STANDARDS CORRESPONDENCE**

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- Letter to the Honourable Ruth Grier, MAC and ACES - Re: Support Regarding Inclusion of Zero Discharge as a Principle in the MISA Program, November 12, 1991.
- Letter to Ivy Wile, Director of the Hazardous Contaminants and Standards Branch - Re: Review of Draft Candidate Substances List for Bans and Phase-outs, January 31, 1992.



Ministry  
of the  
Environment

Ministère  
de  
l'Environnement

MISA  
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Committee

Comité  
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Hon. Ruth Grier  
Minister of the Environment  
135 St. Clair Ave. West  
15th Floor  
Toronto, Ontario  
M4V 1P5

November 12, 1991

Dear Mrs. Grier:

On behalf of the members of the **MISA Advisory Committee** and the **Advisory Committee on Environmental Standards**, we write to applaud you on your efforts to incorporate pollution prevention and zero discharge strategies into Ontario's environmental agenda. Many difficult questions will confront you over the next few months as efforts are made to integrate these strategies, not only into the MISA program, but also into the proposed Safe Drinking Water Act and federal and provincial commitments under the Canada-Ontario Agreement and the Great Lakes Water Quality Agreement.

In our view, the implementation of these strategies, and particularly zero discharge, must be undertaken carefully. It is our perception that many MOE activities may be impacted by the introduction of zero discharge; and that the full implications of this are not yet fully understood. We are particularly concerned about the ongoing development of an MOE list of compounds slated for zero discharge. To date, this development has proceeded without advice from your advisory committees or other extra-government parties. In our opinion, this activity is sufficiently central to the implementation of zero discharge that it should be subject to broad review by government, industry, and the public. ACES could play an important role in coordinating that review as part of its public consultation mandate.

We would like to suggest that the MAC-ACES Joint Sub-committee meet with you in the next few weeks to discuss the practicalities of implementing zero discharge strategies in Ontario. Early consideration of these important issues will reduce the potential for argument and consequent delays in the MISA program, drinking water legislation, and other important initiatives.

Yours very truly,

Isobel W. Heathcote  
Chair, MISA Advisory Committee

Mark Goldberg  
Chair, Advisory Committee on  
Environmental Standards



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January 31, 1992

Ms. Ivy Wile  
Director  
Hazardous Contaminants Branch  
Ministry of the Environment  
135 St. Clair Ave. West  
Toronto, Ontario  
M4V 1P5

Dear Ms. Wile:

Further to your request of December 30, the MISA Advisory Committee is pleased to provide the following comments on the report entitled *Development of a Candidate Substances List for Zero Discharge*. The Committee was delighted to see this concrete step towards reductions in the use (and abuse) of persistent toxic chemicals. We were also impressed by the cooperation between Hazardous Contaminants and the Water Resources Branch, including the MISA Office, that clearly underlies the work. It is our opinion that this collaboration between branches with different perspectives and different technical expertise has resulted in a report of wider application than would have been the case with a unilateral effort. Finally, we must extend our thanks to Adam Socha for his informative presentation to MAC on January 24. His comments were most helpful to us in understanding the work done to date and the rationale behind it.

MAC found the report to be complete and well written, and its recommendations thoughtful and persuasive. We support the development of two tiers of candidate parameters. The report will almost certainly beg questions as to why certain chemicals were not on the primary list, so recognition of a secondary tier is helpful in suggesting that the problem doesn't end with the first 17.

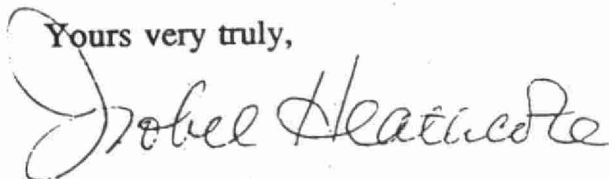
Indeed our only substantial criticism of the report is that the nature of the process from here on is not spelled out. What will the "Technical and Economic Feasibility Study" entail? Who will do it? Will chemicals be de-listed at this point? We are particularly concerned about the potential to conduct a study of technical and economic feasibility before the incorporation of input from air-based, land-based and pesticide lists. We do not believe that such a study can produce accurate results without information on the magnitude of discharges to all media. The contribution of other sources to water, especially runoff and sewage treatment plant effluents, also needs to be taken into account.

We are somewhat confused by Part II of the report, which suggests that substances were only retained on a short list if they were found in Ontario industrial discharges. We would prefer the exercise to be more proactive, identifying not only those chemicals that currently pose a problem but also those that could cause problems if introduced, or used more widely, in future. By the same token, limiting the list to chemicals found in industrial discharges may effectively eliminate those found frequently or predominantly in municipal systems. With more than 11,000 industries currently discharging to municipal sewer systems in the Province, limiting zero discharge parameters to those found in the effluents of a few hundred direct dischargers is both short-sighted and unrealistic.

It is MAC's view that it is now essential that the Ministry develop and explicitly articulate the steps it will take in refining this zero discharge list by extending it to other sources and media and presenting it to industry and the public for review and comment. While the fundamental considerations of persistence, toxicity and bioaccumulation are certainly widely recognized, we believe that it would be a mistake to assume that they reflect the views of all stakeholders. Other characteristics may also be important, for example frequency of discharge (and thus exposure); less persistent chemicals discharged frequently may be of equal or greater concern than highly persistent chemicals rarely discharged. These factors have important implications for the selection and rejection of parameters and therefore must be reviewed by as wide a stakeholder group as possible through an open public review process.

We trust that these comments are helpful to you in finalizing the report and moving ahead to future stages of analysis and review. Again, we congratulate you on a thorough and thoughtful piece of work, and look forward to your further progress on this important initiative.

Yours very truly,



Isobel W. Heathcote

Chair

MISA Advisory Committee

cc: Hon. R. Grier	J. Ashman
J. McLean	J. Smith
G. Posen	A. Socha
G. Ronan	

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## **APPENDIX B.4**

### **MISA ADVISORY COMMITTEE**

### **CORRESPONDENCE REGARDING**

### **MUNICIPAL WATER CONSERVATION**

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- Letter and Document to the Honourable Ruth Grier, Re: MAC's Technical Report on "Water Conservation in Ontario: Implementing the User Pay System to Finance a Cleaner Environment", July 29, 1991.



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Advisory  
Committee

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July 29, 1991

The Honourable Ruth Grier  
Minister  
Ministry of the Environment  
15th Floor  
135 St. Clair Avenue West  
Toronto, Ontario  
M4V 1P5

Attention: Joyce McLean

Dear Mrs. Grier:

The MISA Advisory Committee is pleased to attach herewith a copy of our recent technical report "Water Conservation in Ontario: Implementing the User Pay System to Finance a Cleaner Environment". This report is the longer technical version of the summary report sent to you on January 18, 1991.

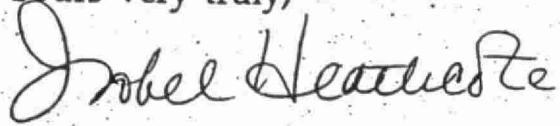
MAC believes that this report contains important information which has not appeared elsewhere to date. In particular, the report details the probable costs of infrastructure restoration and expansion - staggering costs which cannot be contemplated without water conservation and full-cost pricing of water and sewage services.

We have reached a critical stage in our management of provincial water resources. In keeping with the Ministry's goal of "reduce, reuse and recycle", MAC urges you to support the linked principles of water conservation and a "user pay" system. Without that support, our current wasteful water use practices will continue to degrade water quality, increase infrastructure renewal costs, and waste precious government monies on non-productive subsidies.

We ask that you review the attached report and, if you find it acceptable, allow us to distribute it to the many interested parties concerned about this important issue.

The Committee would, of course, be pleased to meet with you to discuss the implications of this report or to answer any questions you may have about it.

Yours very truly,

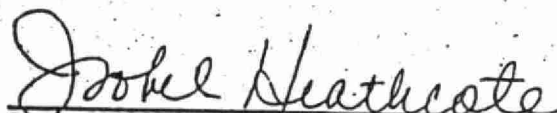
A handwritten signature in cursive script, reading "Isobel Heathcote". The signature is written in dark ink and is positioned below the typed name.


Isobel Heathcote  
Chair  
MISA Advisory Committee

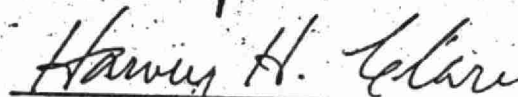
Attach.


MISA Advisory Committee Technical Report on Water Conservation in Ontario:  
Implementing the User Pay System to Finance a Cleaner Environment -  
Submitted July 29, 1991

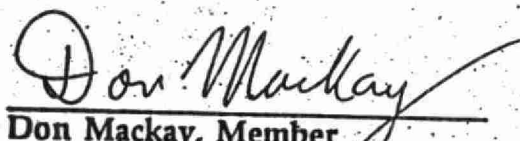
MISA ADVISORY COMMITTEE

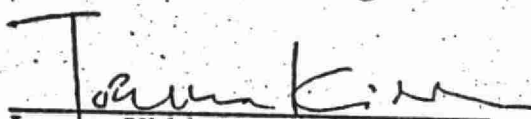
  
Isobel Heathcote, Chairman

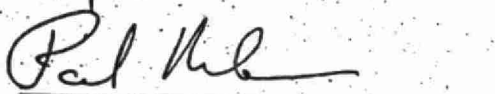
  
Kal Millyard, Vice-Chairman

  
Harvey Clate, Member

  
Paul Hebert, Member

  
Don Mackay, Member

  
Joanna Kidd, Member

  
Paul Muldoon, Member





**Environment  
Environnement**

**MUNICIPAL/INDUSTRIAL  
STRATEGY FOR  
ABATEMENT (MISA)**

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## **WATER CONSERVATION IN ONTARIO:**

**Implementing the User Pay System to Finance a Cleaner Environment**

**Technical Report**

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**MAY 1991**

**MISA ADVISORY COMMITTEE**



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